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October 13, 2022

**VIA ECF**

Hon. Sarah L. Cave  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street, Room 1670  
New York, NY 10007

**Re: *Flynn et al v. Cable News Network*, No. 1:21-cv-02587 (S.D.N.Y.) – Consented-  
to Letter Request to Convert Telephonic Discovery Conference to In-Person**

Dear Judge Cave:

We represent Defendant Cable News Network (“CNN”) in the above-referenced action.

We respectfully request that this Court convert the scheduled telephonic discovery conference on October 28, 2022 at 12 pm (ECF 78) into an in-person conference at the same date and time. Plaintiffs’ counsel and CNN’s conflict counsel on the Twitter consent letter-motion agree to this request. Given the scope of the current and enduring discovery disputes between the parties, the parties believe that an in-person discovery conference will facilitate a more productive dialogue.

Thank you for your consideration.

Respectfully Submitted,

Davis Wright Tremaine LLP

A handwritten signature in blue ink, reading "Katherine M. Bolger".

Katherine M. Bolger